



NORTHEAST WASHINGTON FOREST COALITION

Mr. Rodney Smoldon, Forest Supervisor
Colville National Forest
765 S Main St
Colville, WA 99114

Supervisor Smoldon:

We appreciate the opportunity to provide input on the Stimson Land Exchange and hope to work collaboratively to find solutions for both entities.

We are supportive of the purpose and need of this land exchange proposal. We see the value in consolidating ownership to improve ecosystem management and restoration. We are encouraged by the effort to increase contiguous habitat for Canada lynx, grizzly bear, bull trout, and mountain caribou on federal lands. We are also encouraged by the effort to acquire inholdings within the boundaries of the Little Pend Oreille National Wildlife Refuge. Additionally, we have several questions and concerns about the impacts of this project.

During information sessions about the land exchange provided to the Northeast Washington Forest Coalition, we have heard much about the benefits and gains this proposal may provide to the public. However, less information has been shared about the lost values on the land that Stimson Lumber Company (SLC) may acquire. In addition to assessing gained values, we would like to see an evaluation of lost values including, but not limited to, old-growth forests & large trees, streams, wetlands, other aquatic resources, rare plants, wildlife habitat, cultural resources, and recreation.

Purchase rather than exchange

We have heard that SLC is only interested in a land exchange rather than selling their lands to the Forest Service. However, if the objective is to reduce habitat fragmentation and increase ecosystem management and management, in general, a more effective approach would be a land purchase, in whole or part, by the CNF. We understand that this is not normal USFS practice but feel it prudent to request that it be an alternative analyzed in detail because of the significance and size of this proposal.

Specifically, our concerns center on the fact that the land owned by SLC is heavily roaded and fragmented due to industrial timber management. Therefore, it is a reasonable assumption that land acquired by SLC from the CNF may be similarly fragmented due to industrial timber management as time progresses. While this overall fragmentation increase will decrease as the potential lands acquired by the CNF are restored, we are concerned about subsequent long-term impacts. Whether exchanged or purchased, with accelerating climate change, our concerns are valid that this short-term fragmentation may have a long-term detrimental impact on wildlife populations and overall ecosystem health and resilience.



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Required Restoration of Stimson Lands

Industrial timber management does not have the same objectives as management on the CNF. We have concerns about the state of the SLC lands for the proposed acquisition. While we've heard that these lands are in various stages of timber regrowth, SLC lands will likely need extensive restoration. We would like to see an assessment of the restoration need for these lands. If herbicides were used, what are the existing and future impacts and remediation costs to protect native vegetation, wildlife and water quality? Is there funding available for the restoration of 60,000 acres of land? Will this stretch the personnel time of an already strapped workforce? We ask that this be considered in the assessment.

Climate Change and Wildlife

Recent evidence has shown that climate change is accelerating faster than anticipated (IPCC 2021). Moisture deficit projections for nearby forest restoration projects on the Colville National Forest show that area forests may change dramatically in the next 35 years (Sxwuytn EA 2020). There is a likely potential that habitat for Canada lynx will be decreased within that time period. Therefore, we ask that accelerating climate be considered in your assessment of the project. Will the land potentially acquired by the CNF be able to recover sufficiently to provide habitat for Canada lynx, grizzly bears, bull trout, and mountain caribou before the habitat is lost to a warming climate?

Transportation System

We are concerned about the extensive transportation system that the CNF would acquire in this proposed project. With 530 miles of roads on the lands proposed to be acquired by the CNF and 150 miles to be conveyed to SLC, we are concerned about the short-term increase in road miles in Northeast Washington and the subsequent impacts on aquatic health. This short-term increase may be especially detrimental and lead to long-term, lasting effects in light of accelerating climate change. We request that the analysis address the qualitative, quantitative and economic costs of repair, maintenance and/or decommissioning to meet Forest Plan standards.

Real Estate Appraisal & Valuation of Exchange

While we've asked several times about what is considered in the real estate appraisal, we still haven't received a clear answer to our question. We would like to see a detailed explanation of the values considered in the real estate appraisal. Currently, it is our understanding that the assessment considers the value of the timber and the value of the real estate itself. We are interested in seeing a comparison of the value of the habitat and recreation values gained and lost. We would also like to see the comparison include the cost of restoration and the value of services, including restoration, that will need to be performed.



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Chewelah A-Z project

We see that some of the land to be conveyed is within the Chewelah A-Z project areas. How will the land exchange affect the Chewelah A-Z project?

Recreation

Many of the proposed lands for exchange to SLC are within an area known for abundant recreation near Power Lake and North Fork Calispell Creek. We would like to see an assessment.

Socio-Economics

An acquisition of this size for SLC gives them the potential to control the timber market. We have concerns that this could jeopardize restoration activities that require retained receipts funding on the CNF. We ask that a socio-economic analysis be conducted to show the potential region-wide economic impacts of this proposed land exchange.

Conservation Easements and Encumbrance

When public lands around the Buck Creek area south of the Colville National Forests were exchanged from the CNF to timber companies in the 1980s, an agreement with the Washington Department of Fish and Wildlife required that many roads be closed to public access to protect wildlife. Therefore, we ask that the Forest consider negotiating conservation easements for sensitive areas that may be conveyed to SLC. We are especially interested in considerations that protect large trees, limit the amount harvested per year, protect aquatic habitats, and protect wildlife habitat.

Need for an EIS

The large geographic scope and increased public scrutiny may warrant an Environmental Impact Statement rather than an Environmental Assessment. We understand that the EA process will identify when and if that threshold is reached to shift to a more comprehensive review. Whether an EA or EIS is completed, we encourage a robust economic analysis that includes ecologic economics and climate change considerations.

Thank you for the opportunity to comment on this proposal. NEWFC stands ready to engage and assist the Forest as it contemplates this significant land transfer project. We look forward to future collaboration on the project.

Sincerely,

Northeast Washington Forest Coalition